

Exhibit Y

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF PHIDIA WONG

I, PHIDIA WONG, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present in the area of the World Trade Center Towers when the terrorist attacks of the World Trade Center Towers occurred.

4. I worked for Salomon Smith Barney, which was acquired by Citigroup. We had an office at 7 World Trade Center, New York, NY. I was on my way to work and had gotten off at the Chambers Street lower Manhattan subway station that morning and was walking to the World Trade Center.

5. I was in lower Manhattan, New York City just a few blocks away from what has become known as “Ground Zero” when the plane(s) hit the towers and I received physical injuries in the collapse of the Towers. To the best of my recollection, when I got off the Chambers Street station, the first plane had hit one of the towers. I saw smokes and chaos. When the second plane hit the other tower, people began running in all directions and I was knocked out. I received physical injuries from the collapse of the towers. I, otherwise, had no clear recollection of what actually happened as I lost consciousness. I recall when I woke up, I was screaming with pain.

6. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: My entire body and numerous bones were fractured. Specifically, I had fractures involving the C7 lamina, the right orbital floor, the thoracic spine at T6, the sternum, the right ribcage, the pubic rami and sacrum. I also had a collapse of my lung (pneumothorax). I underwent a spinal stabilization surgery (T6 vertebrectomy/allograft/instrumentation and posterior instrumentation/ICBG) which I was told took 13 hours. I also had a surgery on my right orbital floor fracture. I was hospitalized for over two months. My sister and mother had to come to the United States from Hong Kong, where they were living, in order to care for me.

7. When the paramedics first found me, they thought I was dead because my injuries were so severe that I was unresponsive. I was later told by them that a window had fallen on me, causing my severe injuries. I was also told I might have been hit by a car.

8. I moved back to Hong Kong in 2002 after receiving home medical care in New York for another 2 months. My family took care of me during my recovery both in New York and in Hong Kong as I was unable to work or care 100% for myself. I have severe Post-traumatic stress disorder from the experience. I was on anti-depressants for a long time. I could not work for over 3 years after the attacks due to my physical injuries and the post-traumatic stress disorder.

9. When I first moved back to Hong Kong, I was seen by a neurosurgeon, a psychologist, a psychiatrist, and a physical therapist in order to continue my recovery. Now, I still see the neurosurgeon about once a year and I must go through physical therapy once a week.

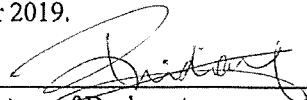
10. Attached as Exhibit B to this Declaration is a true and correct copy of my medical records related to the treatment that I received following the September 11, 2001 terrorist attacks. These are not the entire records, which are voluminous.

10. I suffered, and continue to suffer, from severe emotional distress as a result of the terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to the traumatic events of these terrorist attacks.

11. I previously pursued a claim (Claim Number VCF 212-003642) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for and awarded compensation. A copy of the award letter is attached as Exhibit C.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 26 day of December 2019.



Signature of Declarant

Exhibits Filed Under Seal